



INDEPENDENT ENVIRONMENTAL ENGINEERS, SCIENTISTS AND CONSULTANTS

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June 26, 2008

Ms. Sharon Fang Remedial Project Manager (3HS21) U.S. EPA Region III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

Re: Metal Bank Cottman Avenue NPL Site Revised Remedial Action Schedule

Dear Ms. Fang:

In accordance with paragraph 109 of the "Utility Group Consent Decree," we are submitting with this letter a revised project schedule from Tetra Tech EC, Inc. for the remedial action ("RA") and related activities at the Metal Bank Cottman Avenue NPL Site (the "Site"). This schedule modifies the RA schedule submitted with the final Remedial Action Work Plans approved by EPA effective April 28, 2008. Please review the enclosed schedule and, if acceptable to EPA, provide us with a written confirmation of such acceptance. If you have questions or request additional changes to the schedule, please contact me at your earliest convenience.

We also wish to bring to your attention an issue concerning sequencing of the RA work at the Site. During our Site visit on April 28, 2008, Raymond Lees of Malcolm Pirnie briefly discussed with you the possibility of modifying the work sequencing requirements so that the upland and river work could commence independent of installing the sheet pile wall. By way of background, the Remedial Design submittal of April 9, 2008 provides that the sheet pile wall be installed prior to excavating in SA-4/5 to prevent surface erosion from entering the nearby tidal mudflats. We believe that the approved erosion control plan that already requires the installation of silt fences along the mudflat and Delaware River Site boundaries already adequately accomplishes this objective. The Group's view is that only in the event that excavation in SA-4/5 expanded toward the tidal mudflat as outlined in the Revised Remedial Plan of June 29, 2004, would the sheet pile along the mudflat side need to be completed and in-place prior to completing the SA-4/5 excavation. Sequencing the work such that Southern Area excavations may proceed before the sheet pile wall installation is completed will increase the likelihood that Tetra Tech can complete the upland work and the remaining remedy components this construction season.



June 26, 2008 Ms. Sharon Fang Remedial Project Manager U.S. EPA Region III Page 2 of 2

Please contact John Dobi (973/430-8036) or me (781/213-4930) if you need additional information regarding this submission.

Very truly yours,

MALCOLM PIRNIE, INC.

Joseph P. Vitale, PE, L.S.P.

Joseph Vitale

Project Director

Cc: Cottman Avenue PRP Group

Dan J. Jordanger, Esquire Jeffrey N. Martin, Esquire

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Enclosure

Activity	Activity	Orig	Early	Early	%	2007 2008 2009
ID	Description	Dur	Start	Finish	Comp	J F M A M J J A S O N D J F M A M J J A S O N D J F M A M J
Submittal S	242-112-2		00===0=1		100	I no not of notice
630	Rec Revised Design	1	23FEB07A	23FEB07A	100	Rec Revised Design
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640	Prepare Draft WP Vol. #1	31	03JAN07A	09FEB07A	100	Prepare Draft WP Vol. #1
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650	Malcoln Pirnie/PRP Review Draft WP Vol. #1	10	12FEB07A	23FEB07A	100	Malcoln Pirnie/PRP Review Draft WP Vol. #1
660	Finalize Draft WP Vol. #1	4	26FEB07A	01MAR07A	100	Finalize Draft WP Vol. #1
	I III III III III III III III III III					· ·
670	EPA Review of Draft WP Vol. #1	11	02MAR07A	23JUL07A	100	EPA Review of Draft WP Vol. #1
600	Propers Final MD Val. #1	10	17SEP07A	17OCT07A	100	Prepare Final WP Vol. #1
680	Prepare Final WP Vol. #1	10	ITSEPUTA	1700107A	100	= 11cpate Final W1 Vol. #1
690	MP Review Final WP Vol. #1	4	18OCT07A	240CT07A	100	MP Review Final WP Vol. #1
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700	Prepare Final WP Vol. #1 for EPA	11	24OCT07A	09NOV07A	100	Prepare Final WP Vol. #1 for EPA
W.				Ĭ		
710	EPA Review Final WP Vol. #1	16	09NOV07A	28FEB08A	100	EPA Review linal WP Vol. #1
7.10	El Altolow I mai VIII Vol. III		0011010171	Zoi ZBoort	.00	-
720	Prepare Draft Work Plan Vol. #2	40	08JAN07A	06MAR07A	100	Prepare Draft Work Plan Vol. #2
II.						
700	MD/CDD David David MD V-1 #0	-	07144 0074	001447074	100	MP/PRP Reviw Draft WP Vol #2
730	MP/PRP Reviw Draft WP Vol #2	l °	07MAR07A	09MAR07A	100	INITIAL REVIW DIAIL WY VOI #2
740	Finalize Draft WP Vol #2	10	12MAR07A	23MAR07A	100	Finalize Draft WP Vol #2
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						The Date of the Control of the Contr
750	EPA Review of Draft WP Vol #2	10	26MAR07A	23JUL07A	100	EPA Review of Draft WP Vol #2
760	Prepare Final WP Vol #2	4	17SEP07A	12OCT07A	100	Prepare Final WP Vol #2
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770	Malcom Pirnie Review Final WP Vol #2	5	15OCT07A	31OCT07A	100	Malcom Pirnie Review Final VP Vol #2
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Start Date	02JAN06	Early Bar	COT5	.		Sheet 1 of 5
Finish Date Data Date	26NOV08 24JUN08	Target Ba	ır	Cottma	n Aven	ue PRP Group
Run Date	24JUN08 13:31	Progress 1	Bar	Me	tal Banl	k NPL Site
						
				Con	structio	on Schedule
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ID	Activity Description	Orig Dur	Early Start	Early Finish	% Comp	2007 2008	2009
780	Prepare Final WP Vol #2 for EPA		01NOV07A	09NOV07A	100	J F M A M J J A S O N D J F M A M J J A Prepare Final WP Vol #2 for EPA	SONDJFMA
790	EPA Review Final WP Vol 2	16	09NOV07A	28FEB08A	100	EPA Review linal WP	
	_					•	V V V
800	Receive Notice To Proceed with Construction	0	06JUN08A		100	◆I eceive N	otice To Proceed with Constructi
840	Post- Monitoring Plan Submission by MP	0	24JUN08		0	Post- N	Ionitoring Plan Submission by M
850	EPA Approval of Design & Remedial Action WP	1	29MAY08A	29MAY08A	100	[∣] Е А Аррг	oval of Design & Remedial Action
onstructio	n Schedule						
100	POTW Discharge Permit	25	09JUN08A	14JUL08	40	POT	W Discharge Permit
110	Air Monitoring(2 Weeks Prior to Mob & Construct)	90	17JUN08A	20OCT08	6	Air Monitoring(2 Weeks Prior to Mob & Construct)	===\int i
120	Quaker City YC Letter	1	23JUN08A	23JUN08A	100	Quaker	· City YC Letter
130	St. Vincent School Letter	1	23JUN08A	23JUN08A	100	St. Vine	cent School Letter
810	Mobilization Procurements	16	06JUN08A	30JUN08	70	■ Mobili	zation Procurements
140	Mobilize	3	27JUN08	01JUL08	0	. Mobili	ze
150	Aerial photos (1 pre,1post, 2 progress =4)	109	27JUN08	26NOV08	0	Aerial photos (1 pre,1post, 2 progress =4)	
160	Set temp. support trailer	1	01JUL08	01JUL08	0	Set ten	np. support trailer
170	Survey support	102	30JUN08	18NOV08	0		Survey support
180	Site vegetation clearing	3 :	30JUN08	02JUL08	0	₿ Site ve	getation clearing
180	Site vegetation clearing	3 ;	30JUN08	02JUL08	0	Site ve	getation clearing
rt Date	02JAN06 26NOV08	Early Bar	COT5	Cottma	n Avoni	Sheet 2 of 5 ue PRP Group	
a Date n Date	24JUN08 24JUN08 13:31	Target Bar Progress Ba	1				
						n Schedule	
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Activity	Activity	Orig	Early	Early	%a	2007	2008 2009
ID	Description	Dur	Start	Finish	Comp	2007 J F M A M J J A S O N D J F M A 7	A J J A S O N D J F M A M J
190	erosion controls install	6 3	30JUN08	07JUL08	0	•	erosion controls install
	-						
200	CY1+ CY2 excavation/ 2' backfill	1 (07JUL08	07JUL08	0		CY1+ CY2 excavation/ 2' backfill
						·	
210	Courtyard excavation / R/R track removal	3 (07JUL08	09JUL08	0		Courtyard excavation / R/R track removal
						1	
220	Courtyard backfill (12" soil cap)	2 (09JUL08	10JUL08	0		Courtyard backfill (12" soil cap)
22.0	Courtyard backini (12 Soil cap)		7330L00	1030200	"	ı	Gourtyaru backim (12 Son cap)
							ž
230	Construct site entrance road	1 1 0	7JUL08	07JUL08	0	1	U Construct site entrance road
240	Grubbing	50 0	7JUL08	12SEP08	0	- No. 10. 10. 10. 10. 10. 10. 10. 10. 10. 10	Grubbing
250	Prep. Soil handling + H2o treatment area.	2 1	I4JUL08	15JUL08	0		Prep. Soil handling + H2o treatment area.
						1	-
260	Set const. Support facilities	2 1	I5JUL08	16JUL08	0		Set const. Support facilities
200	Get Const. Support facilities		100000	1030200		ı	3 Set const. Support facilities
270	Construct soil handling pad (155'X155')	3 1	15JUL08	17JUL08	0	1	Construct soil handling pad (155'X155')
280	Mobilize+ set H2o treatment system	3 1	15JUL08	17JUL08	0		Mobilize+ set H2o treatment system
						-	
290	Remove C-L Fence south + west shorelines	3 1	10JUL08	14JUL08	0		Remove C-L Fence south + west shorelines
						•	
300	Take/ Record Ground water level readings	1 1	1JUL08	11JUL08	0		Take/ Record Ground water level readings
	Tana Hasara Salah Masa Nata Hasa Nata Hasa Masa Masa Masa Masa Masa Masa Mas		100200	1100200		ı	Jako Record Ground water Rever readings
040			4 !! !! 00	40 11 11 00			
310	Abandon Monitor wells.	3 1	4JUL08	16JUL08	0	ı	Abandon Monitor wells.
320	Prep. Sheet wall install area	2 1	4JUL08	15JUL08	0	1	Prep. Sheet wall install area
							,
330	Sheet Pile wall monitoring	55 1	4JUL08	26SEP08	0		Sheet Pile wall monitoring
340	Sheet pile wall installation	60 1	4JUL08	03OCT08	0		Sheet pile wall installation
	Silver pro train installation			0000.00			Sheet pile wan instantation
4							
Start Date	02JAN06	Posts De	СОТ5		,	Sheet 3 of 5	
Finish Date	26NOV08	Early Bar Target Bar		Cottma	an Aven	ue PRP Group	
Data Date Run Date	24JUN08 24JUN08 13:31	Progress Ba	r	RA.	stal Ban	k NPL Site	
				Con	structio	on Schedule	
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ACUVITY	Activity	Orig	Larly	Early	%	2007 2008 2000
ID	Description	Dur	Start	Finish	Comp	
350	Sheet wall tie-back installation	44	08AUG08	08OCT08	0	Sheet wall tie-back installation
360	Turbidity monitoring	62	21AUG08	14NOV08	0	Turbidity monitoring
370	Bathymetric survey support (pre and post)	66	18AUG08	17NOV08	0	Bathymetric survey support (pre and post)
380	Install / mantain Turbidity Curtain	18	21AUG08	15SEP08	0	Install / mantain Turbidity Curtain
390	Install subaqueous capping	62	21AUG08	14NOV08	0	Install subaqueous capping
400	Construct shoreline access road west slope.	2	21AUG08	22AUG08	0	Construct shoreline access road wes slope.
410	Sediment Excavation / Backfill	10	26AUG08	08SEP08	0	Sediment Excavation / Backfill
420	Install rip/rap shoreline protection	2	09SEP08	10SEP08	0	Install rip/rap shoreline protection
430	Off-site transportation and disposal	60	09JUL08	30SEP08	0	Off-site transportation and disposal
440	Excavate SA-2 post-ex sampling + Backfill	7	29AUG08	08SEP08	0	Excavate SA-2 post-ex sampling + Backfill
450	Excavate SA-3 + Backfill	3	09SEP08	11SEP08	0	Excavate SA-3 + Backfill
460	Remove 4,000 gal. UST and dispose	4	04SEP08	09SEP08	0	Remove 4,000 gal. UST and dispose
470	Excavate SA-4/5 post-ex sampling and backfill	24	04SEP08	07OCT08	0	Excavate SA-4/5 post-ex sampling and backfill
480	LNAPL Monitoring trench, piping and structures	6	06OCT08	13OCT08	0	LNAPL Monitoring trench, piping and structures
490	Set subgrade southern area from South to North	4 ()2OCT08	07OCT08	0	Set subgrade southern area from So th to North
500	Break / Size concrete debris for backfill	4	18SEP08	23SEP08	0	Break / Size concrete debris or backfill
Start Date Finish Date Data Date Run Date	02JAN06 26NOV08 24JUN08 24JUN08 13:31	Early Bar Target Bar Progress Ba	COT5	Me	tal Bank	Sheet 4 of 5 se PRP Group NPL Site
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Activity	Асцуну	Orig	Early	Earty	7 0	2007. 20	08 2009
ID	Description	Dur	Start	Finish	Comp	J F M A M J J A S O N D J F M A M J	JASOND JEMAM
510	Install new monitor wells = (6)	4 0	2OCT08	07OCT08	0		Install new monitor wells = (6
520	Install non-woven geotextile at southern cap	15 0	7OCT08	27OCT08	0	Install non-woven geotextile at	outhern cap 🌉
530	Install two foot soil cap at southern area.	15 0	7OCT08	27OCT08	0	Install two foot soil cap at sou	thern area.
540	Power wash Bldg. #7	4 1	1SEP08	16SEP08	0		Power wash Bldg. #7
550	Sealing of Bldg.#7	8 1	8SEP08	29SEP08	0	-	Sealing of Bldg.#7
560	Remove and dispose remainder C-L Fence	4 2	2OCT08	27OCT08	0	Remove and dispose remair d	er C-L Fence 🎚
570	Install New chain link fence	16 0	8OCT08	29OCT08	0	_	Install New chain link fen
580	Demo soil handling area	4 1	5OCT08	20OCT08	0	•	Demo soil handling area
590	Demobe H2o treatment facility	2 1	5OCT08	16OCT08	0		Demobe H20 treatment fac
600	Seeding and mulching	7 0	5NOV08	13NOV08	0	-	Seeding and mulching
610	Final survey for As-builts	2 0	5NOV08	06NOV08	0		Final survey for As-built
620	Demobe temporary facilities	4 1	9NOV08	24NOV08	0	Demobe t	nporary facilities
820	Pre-Final Inspection	1 2	2OCT08	22OCT08	0		Pre-Final Inspection
830	Final Inspection	1 2	1NOV08	21NOV08	0	ı	Final Inspection

Construction Schedule	Start Date 02JAN06 Finish Date 26NOV08 Data Date 24JUN08 Run Date 24JUN08 13:31	Early Bar Target Bar Progress Bar	COT5 Sheet 5 of 5 Cottman Avenue PRP Group Metal Bank NPL Site	
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